



September 6, 2017

Hon. Therese Wiley Dancks, U.S. Magistrate Judge
Federal Building and U.S. Courthouse
P.O. Box 7346
Syracuse NY 13261-7346

**RE: David Pasiak vs. Onondaga Community College, et al.
Civil Case No. 6:16-cv-01376**

Dear Magistrate Judge Dancks:

As you know, we are counsel to Plaintiff David Pasiak in the above-referenced matter. I have recently conferred with Defendants' counsel, Brian J. Butler, Esq., and write in regards to a joint request for the Court to hold a status/settlement conference in this matter.

On August 21, 2017, I filed a status report with the Court regarding the parties ongoing discovery efforts. To date, the parties have substantially completed document production and are finalizing a proposed Stipulated Protective Order to be submitted to the Court for review. Once the Stipulated Protective Order is in place, the remaining documents will be produced.


As the Court may be aware, this is a complicated matter which may require the depositions of numerous witnesses, both party and non-party. In addition to this matter, there is an ongoing arbitration involving the retrenchment of Plaintiff's position as an administrator with Defendant Onondaga Community College which is currently pending and scheduled to be heard in early October, 2017.

There have been ongoing discussions regarding a global settlement of all outstanding matters and both parties believe an immediate in person status/settlement conference with the Court may be beneficial prior to the parties conducting the depositions. In addition, considering that the parties are currently exploring settlement and that the fact discovery deadline is September 29, 2017, we respectfully request a thirty-day adjournment of the deadlines in your July 10, 2017 Text Order to allow the parties the opportunity to negotiate and to avoid the cost of multiple depositions if the parties can reach a settlement.

Both counsel have availability during the next couple of weeks if the Court is inclined to hold a status/settlement conference. I have provided Mr. Butler with a copy of this letter prior to filing it with the Court and he is in concurrence with the request.

Respectfully yours,

SAUNDERS KAHLER, L.L.P.

By: 

Merritt S. Locke

MSL:tms

CC: Kristen Smith, Esq.
Brian J. Butler, Esq.